

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

*(Write the District and Division, if any, of the
court in which the complaint is filed.)*

Anthony Carlton Dunlap Sr.

*(Write the full name of each plaintiff who is filing
this complaint. If the names of all the plaintiffs
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)*

-against-

GREENE COUNTY JUSTICE CENTER
SERGEANT CHILDRESS, SHERIFF ARNOTT
OFFICER ROBISON, LIEUTENANT JENKINS
ET. AL "SEE attached"

*(Write the full name of each defendant who is
being sued. If the names of all the defendants
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names. Do not include
addresses here.)*

**Complaint for Violation of Civil
Rights**

(Prisoner Complaint)

17-3120-CV-S-BCW-P

Case No. _____
(to be filled in by the Clerk's Office)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

- Defendants -

JANE DOE [#]1, JANE DOE [#]2, JANE DOE [#]3

OFFICER MORGAN, MAJOR SPALDING, DR. WILKINS,
DR. WALKER, CORPORAL ROBERTS, OFFICER GLOVER
SEVERAL GREENE COUNTY MEDICAL NURSING STAFF.

(JAIL STAFF ARE NOT COOPERATING WITH ME IN MY
INQUIRY FOR DEFENDANT NAMES, SO I PRAY THE
COURT ALLOWS ME TO ADD OR REMOVE DEFENDANTS
WHO I CANT POSSIBLY NAME, WITHOUT BEING PROVIDED
CORRECT INFORMATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Anthony C. Dunlap SR.

All other names by which you have been known:
ERIC S. SAFFORD

ID Number 2958346

Current Institution GREENE COUNTY JUSTICE CENTER

Address 1000 N. BOONVILLE
SPRINGFIELD, MISSOURI 65802

B. The Defendant(s)

- Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation.
- Make sure that the defendant(s) listed below are identical to those contained in the above caption.
- For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both.
- Attach additional pages if needed.

Defendant No. 1

Name JIM ARNOTT

Job or Title SHERIFF
(if known)

Shield Number _____

Employer GREENE COUNTY SHERIFFS DEPARTMENT

Address 1000 N. BOONVILLE
SPRINGFIELD, MISSOURI 65802

☐

Individual capacity

☒

Official capacity

Defendant No. 2

Name

SEARGENT CHILDRESS

Job or Title
(if known)

CORRECTIONS SUPERVISOR

Shield Number

Employer

GREENE COUNTY JUSTICE CENTER

Address

1000 N. BOONVILLE



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):



Federal officials (a *Bivens* claim)



State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights.

What federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

8th Admendment and 14th Admendment rights.
Americans with Disability ACT

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) _____

IV. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?
- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1) ON OR ABOUT January 7th 2017, after struggling to sleep in a sitting position for 3 days, GREENE COUNTY MEDICAL NURSE ADVISED ME THAT SHE WOULD DIRECT CORRECTIONAL STAFF TO MOVE ME TO A BOTTOM BUNK DUE TO Physical Disabilities where one of my arms is immobile and the other severely affected BY GUNS HOT WOUNDS. I WOULD SAY THAT

This was approximately 6:00 a.m. After about 6 hours I still had not been moved to the appropriate bottom bunk, I had the C-WING Trustee ask Correctional Officer ROBISON could he move me to my assigned bunk, because I was tired. I heard OFFICER ROBINSON STATE "I don't give a FUCK about a bunk move". ABOUT 20 minutes later, exhaustion drove me to make a feeble attempt to climb up on top bunk. EVIDENTLY I FELL, BECAUSE WHEN I CAME TO, MY CELLMATE TRAVIS GRAVES WAS SCREAMING. GREENE COUNTY MEDICAL PERSONNEL RESPONDED AND SO DID CORRECTIONAL SUPERVISOR SERGEANT CHLORESS. I ADVISED NURSE THAT I WAS DIZZY, AND MY ARM HURT. I REQUESTED TO SEE A DOCTOR. AFTER CHECKING FEELING IN MY LEGS, NURSES EXITED CELL WITHOUT RESPONSE TO MY REQUEST. I THEN LOOKED TO SERGEANT CHLORESS AND STATED "LOOK AT MY FINGERS, I NEED TO SEE A DOCTOR", TO WHICH HE STATED "THAT AINT GOING TO HAPPEN." HE THEN STATED "YOU NEED TO GET UP". I SAID "I NEED TO SEE A DOCTOR". HE THEN PROCEEDED TO EXIT SAID AND STATED "I DONT GIVE A SHIT IF YOU THROW A BOAT IN HERE, (A BOAT IS TRANSPORTABLE BEDDING PLACED ON THE FLOOR). I REALIZED HE WAS SPEAKING TO OFFICER ROBISON, BECAUSE HE ENTERED THE CELL. OFFICER ROBISON STATED "YOU NEED TO GET UP DUNLAP". I INSISTED, I DONT FEEL UP TO IT. OFFICER ROBINSON STATED HIS REQUEST AGAIN

AND BEGIN TO TRY AND RAISE ME UP, AGAINST MY PROTEST. I WAS FINALLY TRANSFERRED TO ANOTHER CELL AND PLACED ON BOTTOM BUNK.

2) ON 1-8-17, I FILLED OUT A REQUEST FORM ASKING FOR A GRIEVANCE PER GREENE COUNTY POLICY. MY REQUEST WAS RESPONDED TO BY AN OFFICER HUGHES, WHO SAID MY REQUEST WAS DENIED, AND THAT BOTTOM BUNK PLACEMENT REMOVED MY PROBLEM. WHEN I STATED THAT I STILL WANTED TO RAISE ISSUE ABOUT OFFICERS ROBISON AND CHILDESS DISREGARD FOR MY SAFETY AND INADEQUATE INJURY ASSESSMENT, I WAS TOLD "IT IS NOT UP FOR DEBATE" BY OFFICER HUGHES.

ON 1-9-17, I SPOKE WITH A CORPORAL HEERMAN REGARDING A GRIEVANCE. HE STATED HE WOULD TALK TO HIS SERGEANT. LATER WHEN I ASKED HIM ABOUT GRIEVANCE HE STATED THAT HE WAS TOLD I "REFUSED A BOAT," AND ISSUE WAS CLOSED.

WHEN I TOLD HIM THAT WAS LUDICROUS, I NEVER HAD A CHANCE TO REFUSE BOAT, BECAUSE I WAS MOVED TO BOTTOM BUNK IMMEDIATELY, AND SOMEONE WAS TRYING TO CONCEAL SOMETHING, I WAS TACTFULLY EVADED. ON 1-10-17, I REQUESTED A GRIEVANCE FROM CORRECTIONAL SUPERVISOR LIEUTENANT JENKINS, AND WAS IGNORED.

3) ON OR ABOUT 1-8-17 I WAS TRAGED IN C-PDD BY MALE MEDICAL NURSE, WHERE EXPLAINED SYMPTOMS OF DISLOCATED FINGERS, HEADACHES, BODY ACHES. I WAS TOLD I WOULD BE SEEN BY A DOCTOR DUE TO PREEXISTING CHRONIC CONDITIONS AND RECENT INJURIES. BETWEEN THIS DAY AND 1-26-17 (DAY OF MY TRANSFER) I

Continued to request medical attention and never received any for physical illness or neither were my request for mental health services recognized.

4) ON 3-24-17 upon my return to GREENE COUNTY JUSTICE CENTER, I was told to surrender my ~~my~~ RESCUE inhaler and that I would receive it when I got on my assigned floor. When I advised INTAKE OFFICERS that it was a KEEP ON PERSON (K.O.P.) inhaler, and that I needed it in case of emergency, I was told that I would receive it and my other inhalers on MEDICAL CART.

(3-24-17) 5) CLASSIFICATION attempted to house me in an approximately 7'X13' CELL with 2 other inmates and I protested that CELL did not adhere to policy regarding RATED CAPACITY AND DESIGN CAPACITY. I WAS PLACED IN OBSERVATION CELL AS A RESULT. DURING MEDICAL PASS THAT NIGHT I TRIED TO GET NURSES ATTENTION REGARDING ASTHMA INHALER, IGNORED BY NURSE. HOLLERED FOR CORRECTIONS OFFICER TO COME TO MY DOOR. ADVISED OFFICER CLEENEY TO CALL MEDICAL AND SHIFT SUPERVISOR (ESTRELLA) because I was having shortness of breath and declaring medical emergency. C.O CLEENEY returned approximately 5 minutes later, and stated "They said there is nothing they could do about it." Observation cell video surveillance will show that I showed physical signs of labored breathing or shortness of breath because of asthma attack.

b) ON 3-25-17 at approximately 1:30 a.m., I was awoken by loud noise. UPON turning around, I noticed about 6 corrections officers in my cell, restraining an inmate who seemed agitated. UPON release from restraints, this inmate proceeded to kick, scream, and strike cell furnishings with his head and hands. I remained in bed. Inmate then advised C.O. that if they didn't get a sergeant up there, he was going to injure himself and cover "this dudes cell and him in blood". When I heard this I jumped up. C.O. Taylor advised inmate sergeant was en route. Sergeant ESTRELLA responded, and I told him if they didn't get this crazy expletive out of my cell, I was going to snap. I inquired as to how GREENE COUNTY was able to place 2 people, who've declared thoughts of harming themselves in the same cell. I was threatened with restraints. Other inmate eventually rammed his head into door and was extracted from cell. VIDEO SURVEILLANCE CAN CONFIRM.

7) ON 3-25 at or about 9:00 a.m. I was taken to medical for intake. I advised nurse that I was short of breath and needed my inhaler. ABRUPTLY another nurse interjected "WE DONT HAVE ANYTHING FOR YOU". I WENT ON TO STATE THAT I TRANSFERRED FROM PRIOR JAIL WITH MEDICAL AND "PSYCH" DRUGS. TO WHICH I WAS TOLD, "You got that from a Federal Doctor, DR. WILKINS has to prescribe meds that you take here". When I inquired as to how medications can be discontinued, before I was examined by a doctor, especially a life preserving medication

like a asthma Inhaler, I was told "We cant go off your words for what medications you were taking, WE have to verify here". I then stated that I not only transfered with this medication in a bag, but a copy of all medication taken should be in my classification File, (copy was forwarded upon transfer) so you dont have to take my word". I was ignored.

At or about 7:30 p.m I Finally received my asthma Inhaler about 33 hours, after it was taken, ~~and~~ but had suffered 2 asthma attacks during the duration. 8) 3-25-17 at or about 4:30 p.m, while responding to Observation Unit T4, for inmate in T424 covering his camera, LIEUTENANT JENKINS was in front of my cell. I advised this corrections supervisor that I needed to ask a question. I was ignored. I again asserted that I requested an audience with him and he stated Frustratingly "What".

I asked him "IF STAFF really believed I was contemplating injury^{to} myself, why would they put me in a cell with a bunk bed, a desk, and a shelf which contained sharp corners". He stated "who do you think you are". I retorted "Why the (expletive) are you hollering at me, you were just talking calmly to the white inmate, who was being beligerate and destroying County property and you patiently answered his questions, but getting an attitude with me". He stated "I got a solution."

He and 3 other officers responded to my CPH to remove me, and I stood in front of video camera

and used sign language that I was evidently being punished, for questioning an officer while I was black.

I was removed from T423 and placed in T422, and 2 inmates in T422 were placed in T423. I stated that my inquiry wasn't satisfied because now 2 people were in a cell where they could harm themselves, even though they were on suicide watch. I also advised LT. JENKINS that I didn't mind being in the cell, but because I was placed on a concrete floor with no way to get to my feet because of my disability, I would require assistance to use restroom. I was told "Tough Luck". I stated that would be violating the Americans with Disabilities Act, to which I was ignored. Also, I requested Grievance through officer ROWE, per Request Form, request went unanswered.

9) ON 3-26 at or about 7:30 A.M. after hollering for officer assistance to use Restroom, and several feeble attempts to support and raise myself, I was forced to defecate and urinate on cell floor. At or about 11:00 A.M. OFFICER ROWE SERVED

lunch to me in cell with feces and urine. AT 4:00 P.M. OFFICER ROWE again served me dinner in cell where I had to scoot through bodily fluids to get up. NO MEDICATION

10) SPOKE WITH DR. WALKER (MENTAL HEALTH). VOICED MY CONCERNS ABOUT LIMITED CELL SPACING DUE TO OVERCROWDED CELLS, AND THE INFILTRATION it places on my constitutional rights. TOLD BY DR. WALKER "YOU ARE IN JAIL, YOU NEED TO BE FLEXIBLE". I stated being in jail doesn't mean I need to compromise my health, religion, and safety. Was told "well your stay in T4 depends on

get a "BOAT". After 2 hours passed I asked CORPORAL ROBERTS what did he find out, to which he angrily stated "I haven't had chance to call yet". After another 30 minutes passed I inquired again, and was told "MEDICAL SAID they have nothing on RECORD. WAS FORCED TO GET ON FLOOR WHERE I HAD TO RELY ON CELLMATE (HOFFMAN) TO ASSIST ME OFF FLOOR FOR MEALS (RESTROOM).

- 11) 3/31 AFTER being summoned to MEDICAL D OFFICE and speaking to NURSE ABOUT DISABILITY, PREEXISTING CONDITIONS, NEW INJURIES, BOTTOM BUNK RESTRICTION and a week without my medication (to which I was told "It doesn't matter what you were taking, DR. WILKINS HAS TO GIVE YOU ANY MEDS." AFTER A FEW HOURS APPROXIMATELY 5:15 P.M., I WAS summoned by CORRECTIONS OFFICER GLOVER, and told I would be moved to BOTTOM WALK, BOTTOM BUNK. UPON ARRIVING IN CELL, I noticed inmate was already placed in Bottom Bunk. I pointed this out to C.O GLOVER who stated you are going to have to just get on the floor until the bottom bunk comes open. I retorted that it made no sense to move me from one floor to the next. I was told that I could get a boat "MEDICAL POLICY IS BOTTOM BUNK OR BOAT". I PRETESTED THAT COULDN'T BE CORRECT, BECAUSE THAT WOULD BE A BLANKET POLICY REGARDING ALL INMATES REGARDLESS OF PHYSICAL IMPAIRMENT, AND THAT WOULD BE STUPID. CELL DOOR WAS SLAMMED ON ME.

it. I inquired to DR. WALKER ABOUT NOT RECEIVING DR. PRESCRIBED MEDICATIONS, WHICH I REQUIRED FOR MENTAL STABILITY. WAS TOLD OUR DOCTOR HAS TO SEE YOU BEFORE YOU GET WHATEVER YOU WERE TAKEN. I INQUIRED WHEN WAS THAT, BECAUSE I HAD WENT 3 days without my meds" WAS TOLD MEDICAL RELEASE FOR MEDICATION VERIFICATION WAS FAXED ON 3-25-17.

3-28 SPOKE WITH MENTAL HEALTH DOCTOR (NOT DR. WALKER) TAKING OUT OF SUICIDE SMOCK, GIVEN CLOTHES, PLACED IN CELL THAT ACCOMMODATED MY HANDICAP.

- 10) 3-29 TAKEN OFF WATCH, BUT KEPT IN ISOLATION, DUE TO OVERCROWDED CELLS. Attempted to get OFFICER KILLER'S ATTENTION TO USE my RESCUE INHALER, Ignored. HAD TO WAIT UNTIL ANOTHER CORRECTIONS STAFF, OFFICER JOHNSON, RETURNED TO WING, ASKED HIM TO GET MY INHALER, AND ONLY THEN RECEIVED IT.

ABOUT 10 MINUTES PASSED BEFORE GIVEN MY RESCUE INHALER.

- 11 3/30 I WAS RELOCATED FROM ISOLATION TO B-POD. UPON ARRIVAL, I ADVISED CORPORAL ROBERTS THAT I HAD A BOTTOM BUNK RESTRICTION DUE TO MY HANDICAP AND THAT THERE WAS ALREADY AN INMATE IN THE BOTTOM BUNK OF B222. CORPORAL ROBERTS STATED "WELL GET ON THE FLOOR". I RETORTED THAT I SUFFERED FROM ONE PARALYZED ARM, AND ONE SEVERELY WOUNDED ARM FROM GUNSHOT WOUNDS" SO IF I COULDN'T BE EXPECTED TO PULL MYSELF UP AND SUPPORT MYSELF TO GET ON TOP BUNK, WOULDN'T IT BE LOGICAL THAT I COULDN'T PUSH MYSELF UP OFF FLOOR SUPPORTING MY BODY WEIGHT. HE STATED I'LL CALL MEDICAL, BUT ALL I CAN TELL YOU ~~IS~~ IS

- 12) ON 3/31 at 9:00 p.m I requested grievance from officer HODGES, thru Request Form. WAS TOLD BY OFFICER THAT REQUEST REQUIRED MORE INFORMATION, LIKE "NATURE OF GRIEVANCE, RIGHTS VIOLATED, PEOPLE INVOLVED, AND REMEDY REQUESTED". I RESPONDED THAT, THAT INFORMATION WAS ONLY TO BE WRITTEN IN THE BODY OF THE ACTUAL GRIEVANCE, AND SINCE I WAS GRIEVING A MEDICAL ISSUE, I WAS NOT AT LIBERTY TO DISCUSS WITH CORRECTIONS, SHE SAID THATS THE ONLY WAY YOU'LL RECEIVE GRIEVANCE. I RETURNED COMPLETED REQUEST TO C.O HODGES AND WAS TOLD IT WAS NOT DETAILED ENOUGH, FINALLY TURNED IN 1 HOUR LATER. ON 4/1/17 at or about 8:45 p.m I inquired to C.O HODGES what was the status on the REQUEST FOR GRIEVANCE TO "(CORRALLEWS)" she had me thoroughly fill out. She nonchalantly stated "I dont know I cant make him answer it".
- 13) ON 4/5/17 at or about 7:55 p.m I pressed emergency call button. Approximately 3 minutes later OFFICER MORGAN RESPONDED. I advised this officer that I needed my rescue inhaler. Approximately another 2-3 minutes passed by where I again pressed button, C.O MORGAN responded, I requested my rescue inhaler again. He stated "Fall Back". I stated I'm having issues breathing, what the hell did he mean Fall Back. He then stated "TAKE DEEP BREATHS and you'll BE FINE", paused and stated "WHAT'S YOUR NAME, ILL GET YOU YOUR INHALER" ~~AND~~ MY CELLMATES ANTOINE BOSTIC AND CHARLSS KIESOU, STATED "HE'S LAUGHING HE THINKS ITS FUNNY". Approximately another 10 minutes passed

and I suffered an asthma attack. My cellmates stated "he's just standing here having a conversation with the nurse, she had to hear him talking to you about your inhaler." I was on my hands and knees suffering from shortness of breath after about 16 minutes of labored breathing. My cellmate Antoine Bostic jumped down from bunk, pressed call button. Call button was answered by Corporal Lewis, who responded to cell immediately with rescue inhaler. About an hour later, I stopped Officer Morgan and inquired did he know what a rescue inhaler was for. He stated "emergencies." I stated "do you think it's reasonable to make someone wait 15 minutes to receive it?" He stated "No, but you shouldn't have hollered at me".

- 14) At about 2:30 a.m. to 3: a.m, I was awoken by a sudden horrible pain to the arm, upon awakening, I realized that my cellmate Antoine Bostic, had jumped off the top bunk, onto my disabled arm, in an attempt to rush to relieve himself in restroom. He stated "I'm sorry, I forgot you were down there."
- 15) AS OF today 4/6/17, I HAVE still not received any of my medications, Am still confined to a filthy floor to sleep, and still have not seen a doctor for preexisting conditions, injuries sustained at GREENE COUNTY JAIL, OR CONDITIONS THAT REQUIRE ME RECEIVE CHRONIC CARE ASSESSMENT, BY DOCTOR AFTER ARRIVAL.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

BROKEN OR DISLOCATED FINGERS. HEAD, NECK AND BACK INJURIES.
LABORED BREATHING / ASTHMA ATTACKS (CONSTRICTED BREATHING)
Leg injury in regards to requirement to sleep on floor
where I was jumped on by inmate on top bunk.
Proper HEAD injury protocol, X-RAYS, INJURY ASSESSMENT
AND FOLLOW-UP WAS REQUIRED. MENTAL HEALTH MEDICATION
WAS REQUIRED, ALONG WITH LIFE PRESERVING MEDICATIONS. PAIN MEDICATION
AS OF TODAY, I STILL HAVE NOT RECEIVED TREATMENT FOR PREEXISTING OR
INJURIES SUSTAINED AT GREENE COUNTY,

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I WANT THE COURTS TO ORDER GREENE COUNTY TO RELEASE FULL NAMES
OF PLAMTIFFS. I WANT THE COURTS TO ORDER INJUNCTION TO CEASE
VIOLATIONS STILL OCCURRING AS OF TODAY. ORDER GREENE COUNTY
OFFICIALS TO AMEND MEDICAL AND CORRECTIONS POLICY
THAT VIOLATES RIGHTS. I AM REQUESTING MONEY DAMAGES, ACTUAL
AND PUNITIVE, BUT AM HESITANT TO PUT A DOLLAR AMOUNT ON
INJURIES THAT HAVENT BEEN PROPERLY DIAGNOSED, WHEREFORE DONT KNOW EXTENT.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes
☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

GREENE COUNTY JUSTICE CENTER
SPRINGFIELD, MISSOURI

- B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☐ Yes
☐ No
☒ Do not know

- C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes
☐ No
☒ Do not know

If yes, which claim(s)?

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes
☒ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes
☒ No

E. If you did file a grievance:

1. Where did you file the grievance?

2. What did you claim in your grievance? *(Attach a copy of your grievance, if available)*

3. What was the result, if any? *(Attach a copy of any written response to your grievance, if available)*

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

The only way to access a grievance is by stating
the actual facts of a grievance and remedy requested on
written request to a correctional officer, or ^{corrections} supervisor, who solely
makes a decision whether you receive grievance.

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

LT. JENKINS, DR. WALKER, CORPORAL LEWIS, CORPORAL
HEERMAN, OFFICER HUGHES (X2). JANUARY 8th 2017,
JANUARY 9th 2017, JANUARY 10th 2017, JANUARY 11th 2017,
written request, verbal requests and statements. All claims met
with falsehoods or indifference.

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

AN AUDIT OF GRIEVANCE SYSTEM AT GREEN ~~CO~~ COUNTY JUSTICE
CENTER WILL REVEAL FLAWED IF NON EXISTENT ADMINISTRATIVE REMEDIES.
NO OBJECTIVE OR INDEPENDENT GRIEVANCE OFFICER, SO GRIEVANCES ARE
IGNORED OR TACTFULLY EVADED.
(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes
☒ No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes
☒ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes
☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☒ Yes
☐ No

- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Anthony C. Dunlap SR
Defendant(s) CORRECTIONAL MEDICAL SERVICES, ELIZABETH CONLEY
GERALD JOERGENSEN, ROBERT HAMPTON

2. Court (if federal court, name the district; if state court, name the county and State)

UNITED STATES COURTHOUSE - EASTERN DISTRICT OF MISSOURI

3. Docket or index number

?

4. Name of Judge assigned to your case

HONORABLE JEAN K. HAMILTON

5. Approximate date of filing lawsuit

2004

6. Is the case still pending?

☐ Yes
☒ No (If no, give the approximate date of disposition):

05.05.06

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

DISMISSED WITHOUT PREJUDICE DUE TO
MOTION FILING ISSUE.

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 6th, 2017.

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

City State Zip Code

Anthony C. Dunlap Sr.
Anthony C. Dunlap Sr.
2958346
1000 N. BOUNVILLE
SPRINGFIELD, MISSOURI 65802

GREENE COUNTY JUSTICE CENTER
1000 N Boonville
Springfield MO. 65802

Anthony C. Donofrio
Defendant Name

2958346
Jacket #

REC'D APR 14 2017

LEGAL MAIL

UNITED STATE DISTRICT COURT
CLERK OF THE COURT
222 N. JOHN Q. ATWOODS PARKWAY
SPRINGFIELD, MISSOURI 65806



INDIGENT